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TRA DOCKET ROOM
March 25, 2004

Guy M. Hicks
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VIA HAND DELIVERY

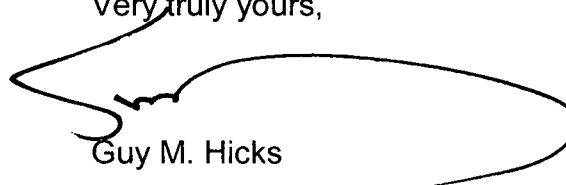
Hon. Deborah Taylor Tate, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Implementation of the Federal Communications Commission's
Triennial Review Order (Nine-month Proceeding) (Loop & Transport)*
Docket No. 03-00527

Dear Chairman Tate:

Enclosed are the original and fourteen copies of BellSouth's First Supplemental Response to KMC's First Interrogatories to BellSouth. Copies of the enclosed are being provided to counsel of record.

Very truly yours,



Guy M. Hicks

GMH:ch

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

IMPLEMENTATION OF THE FEDERAL)	
COMMUNICATIONS COMMISSION'S)	DOCKET NO. 03-00527
TRIENNIAL REVIEW ORDER – 9 MONTH)	
PROCEEDING - LOOP & TRANSPORT)	

**BELLSOUTH TELECOMMUNICATIONS, INC.'S FIRST SUPPLEMENTAL
RESPONSES TO KMC TELECOM III, LLC'S
FIRST SET OF DATA REQUESTS**

BellSouth Telecommunications, Inc. ("BellSouth") respectfully submits the following First Supplemental Responses to KMC Telecom III, LLC ("KMC") First Set of Data Requests, dated January 9, 2004.

BellSouth incorporates herein by reference all of its general and specific objections filed on January 9, 2004. Any responses provided by BellSouth in response to this discovery will be provided subject to and without waiving any of BellSouth's previously filed objections.

SUPPLEMENTAL RESPONSES

REQUEST: For each customer location in BellSouth territory identified in your submission in this docket on January 2, 2004, as satisfying the wholesale trigger for DS1 loops, provide all documents, studies, or records showing that the wholesale trigger is satisfied.

RESPONSE: BellSouth objects to this Request to the extent that it seeks confidential information that BellSouth cannot disclose under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR §64.2007 or under nondisclosure agreements to which BellSouth is a party. BellSouth will only provide CPNI and confidential information consistent with the FCC's rules and BellSouth-executed nondisclosure agreements. Subject to this objection, and without waiving this objection, BellSouth continues to gather the information responsive to this request, much of which is in the possession, custody and control of CLECs who have yet to respond completely to BellSouth's discovery requests. BellSouth will supplement its response to this Request once that discovery process is complete.

SUPPLEMENTAL RESPONSE:

For information responsive to this request, see the Direct Testimony of Shelley Padgett, filed March 1, 2004, Exhibit SWP-11. For additional information see the discovery responses listed below:

- AT&T's Responses to BellSouth's First Set of Interrogatories (Nos. 1-13)
- ICG Telecom Group, Inc. Written Responses in Lieu of Deposition
- MCI's Responses and Objections to BellSouth's First Set of Interrogatories (Nos. 1-13)
- MCI's Second Supplemental Responses to BellSouth's First Set of Interrogatories (Nos. 1-13)
- Memphis Networkx' Reply to Subpoena Duces Tecum
- Time Warner Telecom of the MidSouth, LLC's Responses to BellSouth Telecommunications, Inc.'s Data Requests
- XO Tennessee, Inc.'s Responses to BellSouth Telecommunications, Inc.'s First Set of Interrogatories and First Requests for Production of Documents

Level 3, identified in the exhibits filed on March 1, will be removed in an errata.

REQUEST: For each customer location in BellSouth territory identified in your submission in this docket on January 2, 2004, as satisfying the wholesale trigger for DS3 loops, provide all documents, studies, or records showing that the wholesale trigger is satisfied.

RESPONSE: BellSouth objects to this Request to the extent that it seeks confidential information that BellSouth cannot disclose under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR §64.2007 or under nondisclosure agreements to which BellSouth is a party. BellSouth will only provide CPNI and confidential information consistent with the FCC's rules and BellSouth-executed nondisclosure agreements. Subject to this objection, and without waiving this objection, BellSouth continues to gather the information responsive to this request, much of which is in the possession, custody and control of CLECs who have yet to respond completely to BellSouth's discovery requests. BellSouth will supplement its response to this Request once that discovery process is complete.

SUPPLEMENTAL RESPONSE:

See BellSouth's Supplemental Response to Item No. 3.

REQUEST: For each customer location in BellSouth territory identified in your submission in this docket on January 2, 2004, as satisfying the wholesale trigger, state the basis on which BellSouth contends that a carrier is willing "immediately to provide" a DS1, DS3 or dark fiber loop "on a widely available wholesale basis." Provide your answer separately for DS1, DS3 and dark fiber loops.

RESPONSE: BellSouth objects to this Request to the extent that it seeks confidential information that BellSouth cannot disclose under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR §64.2007 or under nondisclosure agreements to which BellSouth is a party. BellSouth will only provide CPNI and confidential information consistent with the FCC's rules and BellSouth-executed nondisclosure agreements. Subject to this objection, and without waiving this objection, BellSouth continues to gather the information responsive to this request, much of which is in the possession, custody and control of CLECs who have yet to respond completely to BellSouth's discovery requests. BellSouth will supplement its response to this Request once that discovery process is complete.

SUPPLEMENTAL RESPONSE:

See BellSouth's Supplemental Response to Item No. 3.

REQUEST: For each carrier that BellSouth contends is a wholesale provider to any of the customer locations identified in your submission in this docket on January 2, 2004, identify which of the following bases (if any) BellSouth relies on to support its contention that the carrier is a wholesale provider. Please provide your response in the following format

Wholesale Carrier	Carrier's discovery responses indicating offer or purchase of loops	BellSouth's experience in losing wholesale contracts to another carrier	Carrier's advertisements	Carrier's Public Statements	Analyst and industry reports
Carrier A	(check all that apply)				
Carrier B (repeat as necessary)					

RESPONSE: BellSouth continues to prepare its case and has not decided which information upon which it intends to rely in this proceeding. In addition, BellSouth continues to receive discovery responses from CLECs in this proceeding, and because many CLECs have not yet responded completely to BellSouth's discovery requests, BellSouth cannot state at this juncture which discovery responses upon which it will "rely" in this proceeding. BellSouth will supplement its response to this Request once this discovery process is complete.

SUPPLEMENTAL RESPONSE:

See BellSouth's Supplemental Response to Item No. 3 and information provided in the following table. Additional responsive information was provided in BellSouth's Responses to CompSouth's First Set of Interrogatories, Item No. 6, pursuant to the protective agreement in Georgia Public Service Commission Docket No. 17741-U.

SUPPLEMENTAL RESPONSE (Cont'd):

Wholesale Carrier	BellSouth's experience in losing wholesale contracts to another carrier
ADELPHIA/TELCOVE	X
AT&T	X
ICG TELECOM	X
MCI	X
MEMPHIS NETWORKX	X
TIME WARNER TELECOM	X
XO COMMUNICATIONS	X
XSPEDIUS	X

REQUEST: If BellSouth will rely on a carrier's discovery response to demonstrate that the carrier is a wholesale provider, identify each carrier's discovery response(s) upon which BellSouth relies.

RESPONSE: Because BellSouth continues to receive discovery responses from CLECs in this proceeding and because many CLECs have not yet responded completely to BellSouth's discovery requests, BellSouth cannot state at this juncture which discovery responses upon which it will "rely" in order to demonstrate that a particular carrier "is a wholesale provider." BellSouth will supplement its response to this Request once this discovery process is complete.

SUPPLEMENTAL RESPONSE:

See BellSouth's Supplemental Response to Item No. 3.

REQUEST: If BellSouth will rely on "BellSouth's experience in losing wholesale contracts to another carrier" (see testimony of Shelley Padgett in Florida PSC Docket 030852-TP (filed December 22, 2003) at 9), identify and describe each instance or experience on which BellSouth will rely.

RESPONSE: BellSouth objects to this Request to the extent that it seeks confidential information that BellSouth cannot disclose under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR §64.2007 or under nondisclosure agreements to which BellSouth is a party. BellSouth will only provide CPNI and confidential information consistent with the FCC's rules and BellSouth-executed nondisclosure agreements. Subject to this objection, and without waiving this objection, BellSouth continues to prepare its case and has not decided which information upon which it intends to rely in this proceeding. Once it does so, BellSouth will supplement its response to this Request.

SUPPLEMENTAL RESPONSE:

BellSouth personnel interviewed a variety of sales teams regarding their personal knowledge of competitive activity. If a company competing for wholesale high-capacity business was known, that competitor was included as a wholesaler.

REQUEST: If BellSouth will rely on "[a]nalyst and industry reports identifying carriers as wholesalers" (see testimony of Shelley Padgett in Florida PSC Docket 030852-TP (filed December 22, 2003) at 9), identify the carrier and the report(s) (including without limitation, name of report, date of report, etc.) upon which BellSouth will rely.

RESPONSE: BellSouth continues to prepare its case and has not decided which information upon which it intends to rely in this proceeding. Once it does so, BellSouth will supplement its response to this Request.

SUPPLEMENTAL RESPONSE:

See BellSouth's Supplemental Response to Item No. 3.

REQUEST: If BellSouth will rely on a carrier's "public statements and filings indicating willingness to wholesale or revenues from wholesaling" to demonstrate that a carrier is a wholesale provider (see testimony of Shelley Padgett in Florida PSC Docket 030852-TP (filed December 22, 2003) at 9), identify each and every statement and filing upon which BellSouth will rely.

RESPONSE: BellSouth continues to prepare its case and has not decided which information upon which it intends to rely in this proceeding. Once it does so, BellSouth will supplement its response to this Request.

SUPPLEMENTAL RESPONSE:

See BellSouth's Supplemental Response to Item No. 3.

REQUEST: If BellSouth will rely on a carrier's "own advertisements offering wholesale services" to demonstrate that a carrier is a wholesale provider (see testimony of Shelley Padgett in Florida PSC Docket 030852-TP (filed December 22, 2003) at 9), identify each and every advertisement and statement upon which BellSouth will rely.

RESPONSE: BellSouth continues to prepare its case and has not decided which information upon which it intends to rely in this proceeding. Once it does so, BellSouth will supplement its response to this Request.

SUPPLEMENTAL RESPONSE:

See BellSouth's Supplemental Response to Item No. 3.

REQUEST: For each customer location in BellSouth territory identified in your submission in this docket on January 2, 2004, as satisfying the self-provisioning trigger for DS3 or dark fiber loops, provide all documents, studies, or records showing that the self-provisioning trigger is satisfied. Please provide separate responses for DS3 and dark fiber loops.

RESPONSE: BellSouth objects to this Request on the grounds that it is overly broad, unduly burdensome, and oppressive. BellSouth further objects on the grounds that it seeks confidential information that BellSouth cannot disclose under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR §64.2007 or under nondisclosure agreements to which BellSouth is a party. BellSouth will only provide confidential information consistent with the FCC's rules and BellSouth-executed nondisclosure agreements. Subject to these objections, and without waiving these objections, BellSouth continues to gather the information responsive to this request, much of which is in the possession, custody and control of CLECs who have yet to respond completely to BellSouth's discovery requests. BellSouth will supplement its response to this Request once that discovery process is complete.

SUPPLEMENTAL RESPONSE:

The following information is responsive to this request:

- The GeoResults GeoLIT Plus™ Report
- Discovery identified in response to Item No. 3
- Cinergy Communications Company's Response to BellSouth Telecommunications, Inc 's First Set of Interrogatories RE: Loop & Transport

Qwest, identified as satisfying the self-provisioning trigger, will be removed in an errata.

REQUEST: Will BellSouth rely on the GeoLIT Plus Report produced by GeoResults, Inc to support its contention that a carrier has deployed facilities to a customer location? If so, provide a copy of the report(s) on which BellSouth will rely, identify the carrier(s) that BellSouth will contend have deployed facilities, the location(s) to which BellSouth will contend those facilities have been deployed and state all actions that BellSouth took to verify, refine or modify the information contained in the report(s) on which BellSouth will rely.

RESPONSE: BellSouth objects to this Request to the extent it seeks confidential information that BellSouth cannot disclose under a nondisclosure agreement to which BellSouth is a party. BellSouth will only provide such information consistent with this BellSouth-executed nondisclosure agreement. Subject to this objection, and without waiving this objection, BellSouth continues to prepare its case and has not decided which information upon which it intends to rely in this proceeding. Once it does so, BellSouth will supplement its response to this Request.

SUPPLEMENTAL RESPONSE:

Yes. Consistent with is BellSouth-executed nondisclosure agreement, BellSouth will make a copy of the GeoLIT Plus™ Report produced by GeoResults, Inc. available for inspection at a mutually agreeable time at BellSouth's offices at 675 West Peachtree Street, Atlanta, Georgia.

See the Direct Testimony of Shelley Padgett, filed March 1, 2004, Exhibit SWP-13 for a list of carriers. The specific locations are listed below:

Address	City
2525 PERIMETER PLACE DR	NASHVILLE
460 METROPLEX DR	NASHVILLE
801 BROADWAY	NASHVILLE
820 FESSLERS PKWY	NASHVILLE

SUPPLEMENTAL RESPONSE (Cont'd):

Address	City
119 MILAN WAY	OAK RIDGE
4605 LYONS VIEW PIKE	KNOXVILLE
633 CHESTNUT ST	CHATTANOOGA
209 10TH AVE S	NASHVILLE
505 FESSLERS LN	NASHVILLE
633 CHESTNUT ST	CHATTANOOGA
300 E ML KING BLVD	CHATTANOOGA
633 CHESTNUT ST	CHATTANOOGA

The GeoResults GeoLIT Plus™ Report utilized the Telcordia COMMON LANGUAGE® Location Codes (CLLI™ Codes) in the CLONES (Central Location Online Entry System) master database and associated descriptions to identify fiber equipment installations. Included in GeoResults data were locations where carriers did not self-provision fiber, but obtained fiber-based services from other companies such as BellSouth's SMARTRing® Service.

In order to use the GeoLIT data to identify carriers which self-provisioned fiber, it was necessary to eliminate carrier locations where fiber was obtained on a wholesale basis from a separate company. Review of the CLONES data, in particular the "Description" field, for those records that GeoResults had used to include that carrier's location in their database, allowed BellSouth to determine if the record was for a wholesale service.

Wholesale services were identified in CLONES as provisioned by one company, identified in the "OTC" (Operating Telephone Company) field, for another company, identified in the free-form "Description" field.

For example, the MIATFLAD location had been identified in the GeoLIT Plus data as a fiber installation for WorldCom. Review of the CLONES data for this record indicated that it was a wholesale-provided fiber service. Thus, the carrier's location was removed from the GeoLIT Plus data for purposes of identifying self-provisioned fiber installations.

CLLI	MIATFLAD
Address	49 NW 5TH ST (Miami, FL)
Desc	SMARTRING – WORLDCOM
OTC	BS (BellSouth)

REQUEST: For each transport route in BellSouth territory identified in your submission in this docket on January 2, 2004, state whether BellSouth contends (1) that the self-provisioning trigger is satisfied, (2) that the wholesale trigger is satisfied or (3) that non-impairment should be found as a result of a potential deployment analysis. Provide your answers separately for DS1, DS3 and dark fiber.

RESPONSE: To the extent currently available to BellSouth, the information responsive to this request is contained in Attachment No. 14, which is proprietary and being provided subject to the terms of the nondisclosure agreement in this proceeding. BellSouth continues to receive discovery responses from CLECs in this proceeding, and many CLECs have not yet responded completely to BellSouth's discovery requests. However, at this time BellSouth has not identified any additional transport routes that meet the criteria for potential deployment of alternative facilities.

SUPPLEMENTAL RESPONSE:

For information responsive to this request, see the Direct Testimony of Shelley Padgett, filed March 1, 2004, Exhibits SWP-6 through SWP-10 and the Direct Testimony of Dr. Aniruddha Banerjee, Exhibit AXB-3.

REQUEST: For each transport route in BellSouth territory identified in your submission in this docket on January 2, 2004, identify the carriers that BellSouth contends have deployed their own transport facilities between the two central offices on the transport route. State whether the carrier has deployed DS1, DS3 or dark fiber transport on the route.

RESPONSE: See BellSouth's response to KMC's First Data Requests, Item No. 14.

SUPPLEMENTAL RESPONSE:

See BellSouth's Supplemental Response to Item No. 14.

REQUEST: For each transport route in BellSouth territory identified in your submission in his docket on January 2, 2004, as satisfying the wholesale trigger for DS1 transport, provide all documents, studies, or records showing that the wholesale trigger is satisfied.

RESPONSE: BellSouth objects to this Request to the extent that it seeks confidential information that BellSouth cannot disclose under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR §64.2007 or under nondisclosure agreements to which BellSouth is a party. BellSouth will only provide CPNI and confidential information consistent with the FCC's rules and BellSouth-executed nondisclosure agreements. Subject to this objection, and without waiving this objection, BellSouth continues to gather the information responsive to this request, much of which is in the possession, custody and control of CLECs who have yet to respond completely to BellSouth's discovery requests. BellSouth will supplement its response to this Request once that discovery process is complete.

SUPPLEMENTAL RESPONSE:

See BellSouth's Supplemental Response to Item No. 14 and Direct Testimony of Shelley Padgett, filed March 1, 2004, Exhibits SWP-12 and SWP-14. For additional information see the discovery responses listed below:

- AT&T's Responses to BellSouth's First Set of Interrogatories (Nos. 1-13)
- KMC Telecom III, LLC's Responses to BellSouth Telecommunication's Subpoena Duces Tecum
- MCI's Responses and Objections to BellSouth's First Set of Interrogatories (Nos. 1-13)
- MCI's Second Supplemental Responses to BellSouth's First Set of Interrogatories (Nos. 1-13)

SUPPLEMENTAL RESPONSE (Cont'd):

- Memphis Networkx' Reply to Subpoena Duces Tecum
- Time Warner Telecom of the MidSouth, LLC's Responses to BellSouth Telecommunications, Inc.'s Data Requests
- XO Tennessee, Inc.'s Responses to BellSouth Telecommunications, Inc.'s First Set of Interrogatories and First Requests for Production of Documents

REQUEST: For each transport route in BellSouth territory identified in your submission in this docket on January 2, 2004, as satisfying the wholesale trigger for DS3 transport, provide all documents, studies, or records showing that the wholesale trigger is satisfied.

RESPONSE: BellSouth objects to this Request to the extent that it seeks confidential information that BellSouth cannot disclose under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR §64.2007 or under nondisclosure agreements to which BellSouth is a party. BellSouth will only provide CPNI and confidential information consistent with the FCC's rules and BellSouth-executed nondisclosure agreements. Subject to this objection, and without waiving this objection, BellSouth continues to gather the information responsive to this request, much of which is in the possession, custody and control of CLECs who have yet to respond completely to BellSouth's discovery requests. BellSouth will supplement its response to this Request once that discovery process is complete.

SUPPLEMENTAL RESPONSE:

See BellSouth's Supplemental Response to Item No. 16.

BellSouth Telecommunications, Inc.

TRA Dkt. No. 03-00527

KMC's 1st Set of Data Requests

January 9, 2004

SUPPLEMENTAL RESPONSE Item No.18

Page 1 of 1

REQUEST: For each transport route in BellSouth territory identified in your submission in this docket on January 2, 2004, as satisfying the wholesale trigger for dark fiber transport, provide all documents, studies, or records showing that the wholesale trigger is satisfied.

RESPONSE: BellSouth objects to this Request to the extent that it seeks confidential information that BellSouth cannot disclose under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR §64.2007 or under nondisclosure agreements to which BellSouth is a party. BellSouth will only provide CPNI and confidential information consistent with the FCC's rules and BellSouth-executed nondisclosure agreements. Subject to this objection, and without waiving this objection, BellSouth continues to gather the information responsive to this request, much of which is in the possession, custody and control of CLECs who have yet to respond completely to BellSouth's discovery requests. BellSouth will supplement its response to this Request once that discovery process is complete.

SUPPLEMENTAL RESPONSE:

See BellSouth's Supplemental Response to Item No. 16.

BellSouth Telecommunications, Inc.

TRA Dkt. No. 03-00527

KMC's 1st Set of Data Requests

January 9, 2004

SUPPLEMENTAL RESPONSE Item No.19

Page 1 of 1

REQUEST: For each transport route in BellSouth territory identified in your submission in this docket on January 2, 2004, as satisfying the wholesale trigger, state the basis on which BellSouth contends that a carrier is willing "immediately to provide" DS1, DS3 or dark fiber transport "on a widely available wholesale basis." Provide your answer separately for DS1, DS3 and dark fiber.

RESPONSE: BellSouth objects to this Request to the extent that it seeks confidential information that BellSouth cannot disclose under the FCC's Customer Proprietary Network Information ("CPNI") rules, 47 CFR §64.2007 or under nondisclosure agreements to which BellSouth is a party. BellSouth will only provide CPNI and confidential information consistent with the FCC's rules and BellSouth-executed nondisclosure agreements. Subject to this objection, and without waiving this objection, BellSouth continues to gather the information responsive to this request, much of which is in the possession, custody and control of CLECs who have yet to respond completely to BellSouth's discovery requests. BellSouth will supplement its response to this Request once that discovery process is complete.

SUPPLEMENTAL RESPONSE

See BellSouth's Supplemental Response to Item No. 16. (

REQUEST: For each carrier that BellSouth contends is a wholesale provider on any of the transport routes identified in your submission in this docket on January 2, 2004, identify which of the following bases (if any) BellSouth relies on to support its contention that the carrier is a wholesale provider. Please provide your response in the following format:

Wholesale Carrier	Carrier's discovery responses indicating offer or purchase of loops	BellSouth's experience in losing wholesale contracts to another carrier	Carrier's advertisements	Carrier's Public Statements	Analyst and industry reports
Carrier A	(check all that apply)				
Carrier B (repeat as necessary)					

RESPONSE: BellSouth continues to prepare its case and has not decided which information upon which it intends to rely in this proceeding. In addition, BellSouth continues to receive discovery responses from CLECs in this proceeding, and because many CLECs have not yet responded completely to BellSouth's discovery requests, BellSouth cannot state at this juncture which discovery responses upon which it will "rely" in this proceeding. BellSouth will supplement its response to this Request once this discovery process is complete.

SUPPLEMENTAL RESPONSE:

See BellSouth's Supplemental Response to Item No. 16 and responsive information provided in the following table.

BellSouth Telecommunications, Inc.

TRA Dkt. No. 03-00527

KMC's 1st Set of Data Requests

January 9, 2004

SUPPLEMENTAL RESPONSE Item No. 20

Page 2 of 2

SUPPLEMENTAL RESPONSE (Cont'd):

Wholesale Carrier	BellSouth's experience in losing wholesale contracts to another carrier
Adelphia/Telcove	X
AT&T	X
KMC Telecom	X
MCI	X
Memphis Networx	X
Time Warner	X
XO Communications	X

REQUEST: If BellSouth will rely on a carrier's discovery response to demonstrate that the carrier is a wholesale provider, identify each carrier's discovery response(s) upon which BellSouth relies.

RESPONSE: Because BellSouth continues to receive discovery responses from CLECs in this proceeding and because many CLECs have not yet responded completely to BellSouth's discovery requests, BellSouth cannot state at this juncture which discovery responses upon which it will "rely" in order to demonstrate that a particular carrier "is a wholesale provider." BellSouth will supplement its response to this Request once this discovery process is complete.

SUPPLEMENTAL RESPONSE:

See BellSouth's Supplemental Response to Item No. 16.

REQUEST: If BellSouth will rely on "BellSouth's experience in losing wholesale contracts to another carrier" (see testimony of Shelley Padgett in Florida PSC Docket 030852-TP (filed December 22, 2003) at 9), identify and describe each instance or experience on which BellSouth will rely.

RESPONSE: BellSouth continues to prepare its case and has not decided which information upon which it intends to rely in this proceeding. Once it does so, BellSouth will supplement its response to this Request.

SUPPLEMENTAL RESPONSE:

BellSouth personnel interviewed a variety of sales teams regarding their personal knowledge of competitive activity. If a company competing for wholesale high-capacity business was known, that competitor was included as a wholesaler. Also see BellSouth's Supplemental Response to Item No. 20.

REQUEST: If BellSouth will rely on "[a]nalyst and industry reports identifying carriers as wholesalers" (see testimony of Shelley Padgett in Florida PSC Docket 030852-TP (filed December 22, 2003) at 9), identify the carrier and the report(s) (including without limitation, name of report, date of report, etc.) upon which BellSouth will rely.

RESPONSE: BellSouth continues to prepare its case and has not decided which information upon which it intends to rely in this proceeding. Once it does so, BellSouth will supplement its response to this Request.

SUPPLEMENTAL RESPONSE:

See BellSouth's Supplemental Response to Item No. 16.

REQUEST: If BellSouth will rely on a carrier's "public statements and filings indicating willingness to wholesale or revenues from wholesaling" to demonstrate that a carrier is a wholesale provider (see testimony of Shelley Padgett in Florida PSC Docket 030852-TP (filed December 22, 2003) at 9), identify each and every statement and filing upon which BellSouth will rely.

RESPONSE: BellSouth continues to prepare its case and has not decided which information upon which it intends to rely in this proceeding. Once it does so, BellSouth will supplement its response to this Request.

SUPPLEMENTAL RESPONSE:

See BellSouth's Supplemental Response to Item No. 16.

REQUEST: If BellSouth will rely on a carrier's "own advertisements offering wholesale services" to demonstrate that a carrier is a wholesale provider (see testimony of Shelley Padgett in Florida PSC Docket 030852-TP (filed December 22, 2003) at 9), identify each and every advertisement and statement upon which BellSouth will rely.

RESPONSE: BellSouth continues to prepare its case and has not decided which information upon which it intends to rely in this proceeding. Once it does so, BellSouth will supplement its response to this Request.

SUPPLEMENTAL RESPONSE:

See BellSouth's Supplemental Response to Item No. 16.

Respectfully submitted this 25th day of March, 2004.

BELLSOUTH TELECOMMUNICATIONS, INC.



Guy M. Hicks

Joelle Phillips

333 Commerce Street, Suite 2101

Nashville, Tennessee 37201-3300

615-214-6301

R. Douglas Lackey

Andrew Shore

Meredith Mays

675 W. Peachtree St., NE, Suite 4300

Atlanta, GA 30375

532229

CERTIFICATE OF SERVICE

I hereby certify that on March 25, 2004, a copy of the foregoing document was served on the parties of record, via the method indicated:

☐ Hand
☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

Henry Walker, Esquire
Boult, Cummings, et al.
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☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

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☐ Overnight
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☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

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☐ Mail
☐ Facsimile
☐ Overnight
☒ Electronic

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☐ Overnight
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☐ Overnight
☒ Electronic


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☐ Facsimile
☐ Overnight
☒ Electronic

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- ☐ Hand
- ☐ Mail
- ☐ Facsimile
- ☐ Overnight
- ☒ Electronic

Ken Woods, Esquire
MCI WorldCom
6 Concourse Parkway, #3200
Atlanta, GA 30328
Ken.woods@mci.com

A handwritten signature in black ink, appearing to be "Ken Woods", written over a horizontal line. The signature is stylized with a large, sweeping loop.